

- ◆ Edgerton Office 760 Main St. P.O. Box 26 Edgerton, MN 56128 (507) 442-5000
- ◆ Rushmore Office 103 N. Thompson Ave. P.O. Box 48 Rushmore, MN 56168 (507) 478-4121
- ◆ Leota Office 11665 110<sup>th</sup> St. P.O. Box 338 Leota, MN 56153 (507) 443-6741
- ◆ Worthington Office 1433 Oxford St. P.O. Box 725 Worthington, MN 56187 (507) 376-9747
- Pipestone Office 202 2nd Ave., SE P.O. Box 68 Pipestone, MN 56164 (507) 825-0055
- Wal-Mart Office 1055 Ryan's Rd.
  PO. Box 186
  Worthington, MN 56187 (507) 372-2224

September 6, 2005

**FDIC** 

San Francisco Regional Office Director Johns F. Carter 25 Jessie Street at Ecker Square, Suite 2300 San Francisco, CA 94105

Dear Mr. Carter:

We are in a community of ten thousand which had the first Super Wal-Mart in Minnesota. There are two corporate banks, four community banks, and one credit union in this community. Competition is good, but it is also fierce in a community of ten thousand with this many financial institutions.

When Wal-Mart opened its office here in Worthington, we were invited to open a branch office in the Wal-Mart Store. After much consideration, we decided to open an office in the Wal-Mart Store for two reasons: 1) An offensive move to provide a convenience for our customers, and 2) a defensive move, to protect our territory from even more competition in the community.

If Wal-Mart is allowed to have their own bank, several things may or will happen. The size and ruthlessness of Wal-Mart will cause one or more of the existing community banks to become unprofitable if not fail. And as soon as our lease is up in the Wal-Mart office, they will force us out and put their own branch in their office, after we have worked a number of years to build up clientele in that location.

Wal-Mart has a history of de-stabilizing small communities. With their vast resources, they could easily drive out several of our community banks, and where would that leave our community? Wal-Mart already controls a very large part of the non-restaurant and non-automotive sales in the U.S. Allowed to compete with their resources, would soon eliminate many community banks and would leave us where Canada is today with only a few banks. That is not good for our nation.

The Gramm-Leach-Bliley Act discouraged mixing banking and commerce. That is a good way to create conflicts of interest.

We hope that you strongly consider rejecting Wal-Mart's application for deposit insurance for its pending Utah based ILC.

Thank you for your attention to this matter.

Sincerely:

Alvin D. Kooiman, President First State Bank Southwest